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August 23, 2021

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Re: United States v. Graciela Borrero
19 Cr. 789 (PGG)

Dated: August 25, 2021

Dear Judge Gardephe:

I write on behalf of my client Graciela Borrero and with the consent of the Government and Pre-trial officer, to respectfully request that the court amend the terms of Ms. Borrero's pretrial release bond to allow her to travel to Puerto Rico to visit her elderly mother. If permitted Ms. Borrero would travel on August 29, 2021 and return to the Southern District on September 4, 2021. She would reside with her family at URB. La Granja, Calle pepita garcel B#2, Caguas PR 000725

Ms. Borrero was released on a \$50,000.00 PRB on November 7, 2019 and she has been compliant with all the terms of her bond. Her travel is presently restricted to the Southern and Eastern Districts of New York.

The Government and Pretrial officer Courtney Venable as noted above consent to this application.

Respectfully submitted,

/s/

Donald duBoulay

cc: Louis A. Pellegrino, AUSA
Mathew Andrews, AUSA
Christina Venable, PTO